

EJD/DR  
F.#2023R00634

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

STIPULATION & ORDER

- against -

23-CR-383 (FB)

ABEL MORA,

Defendant.

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IT IS HEREBY STIPULATED AND AGREED by and between the  
undersigned, pursuant to Federal Rule of Criminal Procedure 16(d), that:

1. This Stipulation and Order governs certain discovery material to be provided by the government in the above-captioned case and any and all copies, notes, transcripts, documents or other information derived or prepared from such discovery material, that contains personal identifying information and/or medical information of individuals other than the defendant (“Protected Material”), including information relating to the telephone numbers, addresses, social security numbers, dates of birth, medical records and other sensitive material relating to those other individuals.

2. The Protected Material may be reviewed by the defendant, defense counsel and defense counsel’s staff (including associate attorneys, paralegals, assistants and experts employed by defense counsel) only for the purpose of defending against the charges

in the above-captioned case, including but not limited to preparation for trial, any sentencing, any appeal and any collateral attack, involving the charges in the above-captioned case.

3. No Protected Material, or copies thereof, may be taken into any jail facility or possessed in any such facility, except to the extent it may be taken into a jail facility by defense counsel or defense counsel's staff for the sole purpose of reviewing the Protected Material with a defendant in the presence of defense counsel or staff and will not leave the sight or custody of defense counsel or defense counsel's staff. This provision is not intended to limit defense counsel's ability to review the Protected Material with any defendant by video or telephone, provided that no Protected Material is recorded, saved or captured if digitally displayed.

4. In the event that the defendant seeks to file Protected Material with the Court or otherwise use Protected Material during a court proceeding, each such defendant and the defendant's counsel will (1) comply with Rule 49.1(a) of the Federal Rules of Criminal Procedure; (2) ensure that court transcripts are appropriately redacted to protect personal identifying information and/or financial information; and (3) will seek permission from the Court to offer the redacted versions of the Protected Material into evidence unless it is necessary to offer the unredacted version.

5. If the defendant obtains substitute counsel or elects to represent him or herself pro se, the undersigned defense counsel will not transfer any portion of the Protected Material or any copies, notes, transcripts, documents or other information derived or prepared from such discovery material unless and until substitute counsel or the pro se

defendant enters into a Stipulation and Order with the government or otherwise obtains an Order from the Court addressing the provisions of this Stipulation and Order.

6. The Protected Material provided pursuant to this Stipulation and Order, including all copies, shall be destroyed or returned to the United States Attorney's Office, at the conclusion of the trial if the defendant is acquitted on all counts or, in the case of convictions either at trial or by guilty plea, upon completion of any sentencing, appeal or collateral attack on the convictions made by the defendant in this matter.

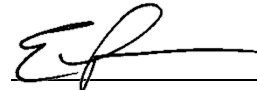
7. Nothing in this Protective Order shall preclude the government from seeking a further protective order pursuant to Rule 16(d) as to particular items of discovery.

8. This Court shall retain jurisdiction over all persons subject to this Order to the extent necessary to enforce any obligations arising hereunder or to impose sanctions for any contempt thereof.

Dated: Brooklyn, New York  
November 15, 2023

JACQUELYN M. KASULIS  
Acting United States Attorney  
Eastern District of New York

By:

  
\_\_\_\_\_  
Emily J. Dean  
Dana Rehnquist  
Assistant U.S. Attorneys

*Kannan Sundaram*  
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Kannan Sundaram, Esq.  
Attorney for Abel Mora

Submitted to the Court  
this 17 day of November, 2023.

SO ORDERED.

/S/ Frederic Block  
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THE HONORABLE FREDERIC BLOCK  
UNITED STATES DISTRICT JUDGE  
EASTERN DISTRICT OF NEW YORK